

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NICOLE GIAIMO and DANIELLE )  
 GIAIMO, )  
 )  
 Plaintiffs, )  
 v. )  
 ) **CASE NO.: 3:12-cv-06962-FLW-TJB**  
 ROYSTON ROBIN, MATTHEW )  
 FLESCH and LIBERTY MARKETING ) **CIVIL ACTION**  
 SYSTEMS, LIMITED LIABILITY )  
 COMPANY D.B.A. LIBERTY MUSIC )  
 GROUP )  
 Defendants.

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## MOTION FOR DEFAULT JUDGMENT

Plaintiffs Nicole Giaimo and Danielle Giaimo moves the Court pursuant to Rule 55(b) Federal Rules of Civil Procedure to enter Default Judgment in favor of Plaintiffs, Nicole Giaimo and Danielle Giaimo, and against Defendants Royston Robin, Matthew Flesch, and Liberty Marketing Systems, Limited Liability Company D.B.A. Liberty Music Group, in the amount of \$150,000 on the ground

that Default has been entered against Defendant by the Clerk for failure to answer or otherwise defend, a copy of which is attached hereto. The Defendant is not in the Military Service of the United States as more particularly shown in the Affidavit of Jason Daniel Stone, Esq. attached hereto.

Respectfully submitted,

Dated: July 10, 2013

/s/ Jason Daniel Stone, Esq.

Jason Daniel Stone, Esq.

Attorney for Plaintiff